

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

SUPPLEMENT TO GOVERNMENT'S SUBMISSION REGARDING ADMISSIBILITY OF
EVIDENCE IN SUPPORT OF VIOLATION OF SUPERVISED RELEASE AND OPPOSITION
TO DEFENDANT'S MOTION TO DISMISS

COMES NOW the United States of America, by and through its undersigned attorneys, and hereby submits the following supplement to its May 19, 2006 submission to the Court regarding the revocation of defendant Ronald G. Johnson's supervised release, and in support thereof states as follows:

1. On May 19, 2006, the government filed its submission regarding admissibility of evidence in support of violation of supervised release and in opposition to defendant's motion to dismiss ("Submission"). At that time, the government indicated that it would be providing the Court with the transcript of the April 7, 2006 hearing before the Honorable Fred. S. Silverman, Superior Court Judge, in the matter of *State of Delaware v. Ronald G. Johnson*, No. 0504012348 as soon as it was completed. A copy of that transcript is attached hereto as Exhibit 1.

2. The transcript confirms: (1) that Mr. Johnson's prior motions to suppress/dismiss had been summarily denied by the Superior Court and (2) that Judge Silverman indicated that he

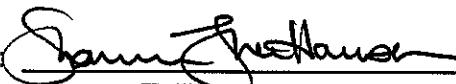
would try to schedule a suppression hearing within two weeks of the April 7, 2006 date. *See* Exhibit 1 at 28-33, 47-48. As this Court is well aware, the state *nol prossed* the charges against Mr. Johnson before that hearing took place. Unless the Court has specific questions for Deputy Attorney General Andrew Vella, it is the government's present intention not to call him as a witness at the May 30, 2006 violation hearing.

3. During the April 7, 2006 hearing, Mr. Johnson also admitted taking 400-600 milligrams of Seroquel on the night of his arrest, indicating, in response to the Court's question, that he intended to raise the insanity defense, among others, to the charges against him. *See* Exhibit 1 at 21.

4. In light of the information contained in this transcript and its previous Submission, the government respectfully requests that the defendant's motion to dismiss be denied in its entirety.

Respectfully submitted,

COLM F. CONNOLLY
United States Attorney

By: 
Shannon T. Hanson
Assistant United States Attorney

Dated: May 24, 2006

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA, :
: Plaintiff, :
: v. : Criminal Action No. 05-29-KAJ
RONALD JOHNSON, :
: Defendant. :
:

CERTIFICATE OF SERVICE

I, Shannon T. Hanson, an employee with the Office of the United States Attorney for the District of Delaware, hereby certify that on the 24th day of May, 2006, I caused to be filed a **Supplement to Government's Submission Regarding Admissibility of Evidence In Support of Violation of Supervised Release and Opposition to Defendant's Motion to Dismiss** with the Clerk of Court. I further certify that a copy of the foregoing was sent via ECF and Courier to counsel of record as follows:

John Deckers, Esquire
800 N. King Street
Suite 302
Wilmington, DE 19801

and by first class mail to:

Ronald G. Johnson
#182421 Pro Se
P.O. Box 9561
Wilmington, DE 19809



Shannon Hanson
Assistant U.S. Attorney